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**Yale Law School**

March 9, 2020

**BY ECF**

The Honorable Analisa Torres  
United States District Judge  
Daniel P. Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Re: *The New York Times Company et al. v. Department of the Treasury*, 19 Civ. 9669  
(AT)

Dear Judge Torres:

I write respectfully on behalf of all parties in the above-referenced action brought under the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), to provide the status update ordered by the Court on February 6, 2020, and to request an adjournment of the initial pretrial conference scheduled for March 18, 2020, at 1 PM. See Dkt. No. 16 (mem. endorsement).

Since the parties’ February 6, 2020, joint letter (Dkt. No. 15), the parties have continued to confer regarding modifications to Plaintiff’s initial FOIA request. Plaintiffs have agreed in principle to narrowing the request and the parties have discussed appropriate ways to do so. The parties believe it would be productive to continue these discussions. They therefore respectfully request that they be permitted to submit a joint status letter updating the Court on their efforts and proposing next steps in this case by April 8, 2020, and that the initial conference scheduled for March 18, 2020, be adjourned to a date and time after April 8 that is convenient for the Court.



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This is the parties' third request for an adjournment of the initial conference. The first two requests were granted. Dkt. Nos. 14 and 16. I thank the Court for its consideration of these requests.

Respectfully submitted,

By: /s/ Charles Crain  
Charles Crain, Supervising attorney  
MEDIA FREEDOM AND INFORMATION  
ACCESS CLINIC  
ABRAMS INSTITUTE  
Yale Law School  
P.O. Box 208215  
New Haven, CT 06520-8215  
Tel: (203) 436-5824  
Fax: (203) 432-3034  
Email: charles.crain@yale.edu